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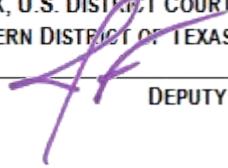
UNITED STATES DISTRICT COURT
for the
Western District of Texas

United States of America
v.

KASHANNA COLEMAN

) Case No. 1:21-MJ-1020-DH

Defendant(s)

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY: 
DEPUTY

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 3, 2020, Febrary 23, 2021 in the county of Travis in the
Western District of Texas, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 922(a)(6)	False Statement in Connection with Acquisition of Firearm
18 U.S.C. § 1001	Making False Statement to Federal Agent (occurring on or about September 22, 2021, and October 11, 2021)

This criminal complaint is based on these facts:

See attached Affidavit.

Continued on the attached sheet.



Complainant's signature

BRANDY HORTON, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Sworn to telephonically and signed electronically.

Date: December 20, 2021



Judge's signature

City and state: Austin, Texas

DUSTIN HOWELL, United States Magistrate Judge

Printed name and title

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

SEALED

UNITED STATES OF AMERICA,

Plaintiff.

V.

KASHANNA COLEMAN,

Defendant.

Criminal No. 1:21-MJ-1020-DH

Affidavit in Support of Criminal Complaint

I, Brandy Horton, being duly sworn, depose and state as follows:

1. I am a Special Agent of the Federal Bureau of Investigation (FBI), and have been so employed since August 2020. I am currently assigned to the San Antonio Field Office, Austin Resident Agency, Austin, Texas. I am currently assigned to a violent crime squad where my responsibilities include enforcing federal criminal statutes, including investigations involving bank robbery, Hobbs Act robberies, violent gangs and groups, fugitives, and firearms violations.

2. This affidavit is submitted in support of a criminal complaint against Kashanna Coleman (COLEMAN), year of birth 1994, for violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2) (False Statement in Connection with Acquisition of Firearm) and 1001 (Making a False Statement to a Federal Agent).

3. This affidavit is based on my personal knowledge as well as investigative activities by other FBI agents and law enforcement officers. Because this affidavit is being submitted for the limited purpose of establishing probable cause for the issuance of the complaint, it does not contain every fact known to me or other agents of the FBI.

Probable Cause

4. Since about April 2021, FBI has been conducting an investigation into an organized criminal group believed to be transporting large quantities of marijuana from California for distribution in and around Austin, Texas, via commercial airline flights to and from Austin-Bergstrom International Airport (ABIA).

5. As part of the investigation, on or about September 8, 2021, FBI executed a federal search warrant issued by this Court at 1908 Shaker Trail, Austin, Texas, a residence being used and maintained by Tyree CLARK. During the search, Agents located a firearm, namely, a FN Herstal, Five-Seven, 5.7x28mm pistol bearing serial number 386193495 (the “Clark FN Firearm”). The firearm, commonly referred to as a “Cop Killer,” found on the third shelf in the kitchen cabinet, was fully loaded, and located with an additional extended magazine and 9mm ammunition. The following are photos of the Clark FN Firearm and the location in the residence where it was found:





6. Previously, on or about March 16, 2021, CLARK was stopped for traffic violations by Texas Department of Public Safety and Austin (Texas) Police Department (APD) personnel and was subsequently arrested for the offenses of Possession of Marijuana and Driving without a License. As part of the arrest, officers seized CLARK's mobile phone.

7. CLARK's phone was later searched under the authority of a state search warrant (SW21100537) issued by a state judge in Travis County, Texas, and found to contain, among other things, photos depicting CLARK holding and displaying large amounts of U.S. currency. It is believed the currency may have been obtained from narcotics trafficking, based on the presence of additional photos depicting marijuana and what appeared to be marijuana being packaged for sale. Also found were photographs depicting CLARK holding various types of firearms and messages with individuals inquiring about purchasing firearms.

8. Open-source research revealed that CLARK's phone number appeared to be associated with Snapchat username "ree-ree78724."

9. Under the authority of a state search warrant (SW21101199) issued on or about

June 1, 2021, by a state judge in Travis County, Texas, for the account associated with Snapchat username “ree-ree78724,” the account revealed a video taken by CLARK on or about February 28, 2021. The video depicted CLARK inside a vehicle showing off a new firearm in his possession. The video included a receipt dated February 19, 2021, of a “FN 5.7 pistol” purchased for \$1,606.80. Additionally, during the same video string, CLARK can be seen holding the newly purchased FN firearm while zooming in on the gun box built for the FN pistol, which also contained accessory items. In the video, CLARK can be heard saying “this my newest member to the Clark Cartel.” The following are still photo outtakes obtained from the video:



10. In or about August 2021, FBI contacted the entity listed on the receipt, North Gaston Gun Shop, in Dallas, North Carolina. An employee of the North Gaston Gun Shop

informed investigators that the entity's records showed that the firearm was purchased by COLEMAN and shipped to Elite Guns, Inc., 2121 W. Parmer Lane, Austin, Texas. The employee further stated that the serial number for the firearm purchased by COLEMAN was 386193495, which is the same serial number for the Clark FN Firearm located at 1908 Shaker Trail, Austin, Texas, on September 8, 2021, described in paragraph 5 above.

Text Messages Between COLEMAN and JM Found on JM's Phone

11. In about March 2021, APD opened a case regarding a shooting involving a Draco style firearm at the Midtown Barbershop in Austin, Texas. During the investigation, APD discovered the shooting possibly stemmed from an alleged kidnapping that took place on or about February 13, 2021 involving JM, a person of interest whose identity is known to me. APD obtained information from a victim involved in the Midtown Barbershop shooting who stated that he only knew of two people with a "Draco" gun that he had "beef" with and one of those people was JM. Additionally, APD met with a confidential informant who said that JM frequently posted on Snapchat, including posts about his marijuana sales and flashing guns, specifically a "Draco" style gun.

12. On or about March 29, 2021, APD stopped JM for running a red light by APD Violent Crimes Task Force Officers. In the course of the encounter, APD seized JM's mobile phone. JM's mobile phone was later searched under the authority of a state search warrant (SW21100605) issued by a state judge in Travis County, Texas.

13. A forensic digital examination of JM's mobile phone revealed several images of suspected marijuana, guns, and a text string between JM's phone (phone number ending in 7362) and a phone number ending in 8699 with the contact name "M.23". According to information from T-Mobile, COLEMAN was the listed device user for phone number ending in 8699 from at

least as early as June 09, 2018 and continuing through on or about May 19, 2021, at a residence in Pflugerville, Texas, believed to be COLEMAN's mother's residence. Additionally, the text strings contain multiple selfie images of COLEMAN that were sent from the phone number ending in 8699 to JM's phone.

14. The text message strings contained numerous text messages from approximately November 2019 until March 2021. Based on a review of the text message strings, it appeared that COLEMAN and JM were in an intimate relationship with each other. Among other things, COLEMAN sent text messages to JM of items that she purchased for him, including clothes, shoes, headphones, and one or more firearms.¹

15. On or about March 6, 2020, COLEMAN texted JM a screenshot of multiple different mini micro-Draco AK47 firearms from a Google search. About an hour later, JM (referred to in the text message strings below as "JM") and COLEMAN exchanged several text messages including the following:

JM: Sweetheart. SIG SAUER 9mm- name of gun. Need extended clip. In club.

COLEMAN: Okay baby going back to bed goodnight and I love you.

JM: And battery for beam on SIG SAUER 9MM. Goodnight love you more. SIG SAUER 9mm p365 name of gun.

[JM then sent a photo of a SIG SAUER 9mm]

JM: If you need to show them the gun.

COLEMAN: Okay I gotcha.

16. On or about March 7, 2020, COLEMAN texted JM letting him know that she was at Reds Indoor Gun Range getting ready to shoot. JM asked COLEMAN if she is going to ask

¹ Material portions of several of the text conversations will be set forth verbatim in the paragraphs below. Any spelling or syntax errors are retained from the original text messages. Any information contained within brackets ([]) was not part of the original text messages, but are intended to explain abbreviations, indicate the use of visual emojis in the text message, indicate the attachment of a photo or video to a text message, or provide other relevant explanation to clarify texting activities or the meaning of texted language or visual cues.

about “the stuff,” COLEMAN responded with, “yes sir.” JM then sent COLEMAN a screen shot of a P365 SIG SAUER with a black outline around the trigger guard on the firearm. COLEMAN responded with “battery right” and JM said “yes.”

17. On or about March 16, 2020, COLEMAN and JM had the following text conversation:

COLEMAN: took them fingerprints last week just waiting on the ID for the license to carry.
JM: we need to go to the gun store
COLEMAN: we can, you trying to get a new gun
JM: Yea
JM: The one I was telling you about
COLEMAN: I was just about to say that lol
COLEMAN: You think they gone have that in store
JM: Yea they do
COLEMAN: Ah okay well that's good you called?
JM: Naw

This text conversation appears to have indicated that COLEMAN was in the process of applying for a Texas concealed carry firearms license, which in fact was issued to her on or about April 9, 2020.

18. On or about March 18, 2020, COLEMAN and JM had the following text conversation:

COLEMAN: Ah okay, I miss you [plus iPhone emoji signifying an unamused face]
COLEMAN: I seen somebody sell the gun you wanted on snap [Snapchat, a messaging app] but I believe it's gone.
[emoji added to COLEMAN's text indicating JM “loved” COLEMAN's response]
JM: Imy2 sweetheart
JM: I need a haircut
COLEMAN: No you don't [plus iPhone emoji signifying a weary face]
JM: And you talking about the one for 800

COLEMAN: And Ino you do [plus iPhone emoji signifying a tired face]

COLEMAN: and yes

JM: Lol I seen it

JM: That's the big one

COLEMAN: Oh okay it looked similar to the one you wanted

JM: And it need to be in yo name

COLEMAN: Yeah that's fine how would you do that

COLEMAN: Find one

JM: They have them at the gun store

COLEMAN: Ah okay probably just have to call around I'll look for you

JM: Wyd [what you doing]

COLEMAN: Sitting here looking up all the gun places so I can see who got it really haven't been doing anything you still riding

JM: Yea

JM: In the bck on this weed [plus iPhone emoji signifying hands to the face]

19. On or about August 5, 2020, COLEMAN and JM had the following text conversation:

JM: Nothing, need to order that gun

COLEMAN: Which one?

JM: Draco

JM: ASAP

COLEMAN: Okay I'll call to tomorrow to see if they got it and to see

JM: Wyd

COLEMAN: Looking listen to music looking crazy

JM: I love you baby!!

COLEMAN: I love you more Jonas

20. On or about August 7, 2020, COLEMAN and JM had the following text conversation:

JM: I need a big a gun

JM: As [indicating a correction to his prior text, which apparently should have read either "I need as big a gun" or "I need a big as[s] gun"]*

COLEMAN: I been told you we need to go looking! But you just been taken what I say and letting it go out one ear to another then forget

JM: Where tho

COLEMAN: There's like to gun shops, I no reds and elite guns! I'll look up more

JM: Academy?

COLEMAN: Oh ya they got guns to

21. On or about August 27, 2020, COLEMAN and JM had the following text conversation:

JM: Need to find the gun

COLEMAN: Which one? You want me to look for cause I called everywhere for the other one babe

JM: That one

COLEMAN: What's another one?

COLEMAN: I keep calling unless you gotta go out of town to get it

JM: You cnt [can't] order it from some where?

COLEMAN: Let me look again! Hold on

[COLEMAN sent JM an image of a Century Arms Micro Draco AK Pistol from dessellesfirearms.com priced at \$674.58]

COLEMAN: Just wrote him

JM: And his shit cheaper

COLEMAN: Ya I seen that! I'm keep looking tho instill he responds I asked him how I can purchase this rifle.

JM: Where they at

[COLEMAN sent a screen shot of another Draco from shopmyexchange.com for \$750.00]

JM: It say sold out

[COLEMAN sent a screen shot of another Draco from dkfirearms.com]

COLEMAN: Let me look

COLEMAN: No this is a different place online

JM: At the bottom

[COLEMAN sent a link to <https://www.centuryarms.com/micro-draco-pistol.html>]

COLEMAN: This is the place I wrote the respond by email

JM: Yea I need that ASAP

COLEMAN: Okay baby

[COLEMAN sent JM the link to

<https://www.gunbroker.com/All/search?Keywords=micro%draco>]²

COLEMAN: They sold out everything but this website you can bid on them! Let me see.

[COLEMAN sent JM a screen shot of the bid she placed for a Century Arms Micro Draco Pistol 7.62X39 with a bid at \$800.00]

[COLEMAN sent JM a screen shot of her phone lock screen. The lock screen had a message from GunBroker.com thanking Kashanna23 for two bids she completed on Century Arms Micro Draco pistols, including two confirmation numbers 877557166SKU and 877189453SKU]

COLEMAN: Found another one to bid on you want the log in?

[emoji added to COLEMAN's text indicating JM liked COLEMAN's response]

COLEMAN: Text me when you finish eating baby

COLEMAN: Headed to my mamas

JM: Wyd

COLEMAN: On the way take nya and mj to Walmart! Wyd

JM: At my granny's

COLEMAN: What did you get to eat how was it

JM: I think I need want

COLEMAN: The gun! Wait till Friday one of the bid end then

JM: Ok

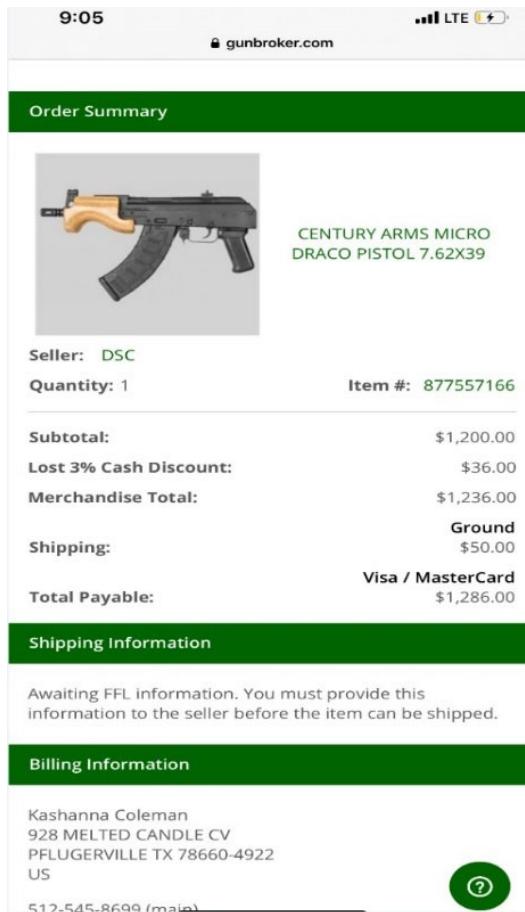
[COLEMAN questioned "what did you get to eat how was it"]

COLEMAN: And we can do next day shipping on it

[emoji added to COLEMAN's text indicating JM liked COLEMAN's response]

² Gunbroker.com claims it is "the world's largest online auction site for firearms and hunting/shooting accessories." The website claims to provide an "informative, safe, and secure way to buy and sell firearms, ammunition, hunting gear, shooting accessories, vehicles, collectibles, and [more]." Third party sellers list items on the site; GunBroker.com serves as the listing service.

22. On or about August 28, 2020, COLEMAN sent JM a screenshot from GunBroker.com of the purchase of the Century Arms Micro Draco pistol that she previously sent to JM. The total merchandise purchase price was \$1,236.00, plus \$50 for shipping. The following is the screenshot:



The following is the text conversation that ensued:

JM: *It didn't do dwn?*
JM: *Go* [indicating correction to prior text, which apparently should have read "It didn't go dwn?"]*
COLEMAN: *Idk [I don't know] I'm go get it transfer tomorrow*
COLEMAN: *So he can ship it*
JM: *You order it?*
COLEMAN: *Yes*
JM: *When it say it gne [gonna or going to] be here.*

JM: And why yo ass didn't tell me before you ordered it

COLEMAN: 3-5 I gotta get it transfer first before i he ships I need to send him a confirmation # and you was on a mission you wasn't gone text me back no way

JM: [iPhone emoji signifying an unamused face]

COLEMAN: Don't look like that

JM: Wyd

COLEMAN: At your mamas laying down trippen

COLEMAN: Drinking

[JM sent COLEMAN a screen shot of a pendant]

JM: I know my momma showed you

COLEMAN: No she didn't but it's nice!

[JM sent COLEMAN a photo of himself wearing the pendant]

JM: It's gne be this big

[emoji added to JM's text indicating COLEMAN loved the response]

COLEMAN: Damn, I like it it's nice

JM: Rip Jut gne spin like this

[JM sent COLEMAN a video]

COLEMAN: Ah that's really nice

[emoji added to JM's text indicating COLEMAN loved the movie]

JM: Ima [I will or I'm going to] give you a 1000 [plus iPhone emoji signifying an unamused face]

COLEMAN: Why you making that face!

COLEMAN: You can wait till it come I think it's like \$75 to get it transferred

JM: Transfer where?

JM: So 1350?

COLEMAN: In my name! And any gun shop

[JM questioned his response to "so 1350"]

COLEMAN: Wyd

JM: Just got my granny's

COLEMAN: Ah oka

JM: When it say it gne be here?

COLEMAN: 3-5 days I have to send the thing yo his email

JM: *Wyd*

COLEMAN: *Laying down watching tv wyd*

JM: *Way [where you at]*

COLEMAN: *Your mama's*

23. On or about August 29, 2020, COLEMAN and JM had the following text conversation:

JM: *What you think?*

[JM sent COLEMAN a photo of a vehicle]

COLEMAN: *It's nice I almost thought it was a mini van!*

[emoji added to JM's text with photo indicating COLEMAN loved the image]

[JM laughed at COLEMAN's response]

COLEMAN: *I like it baby, but test me when you can or get there*

JM: *Wyd*

COLEMAN: *Nothing waiting on mj sitting the car*

[COLEMAN sent JM a photo of pistols locked in a gun case inside a room that resembled a gun shop]

JM: *Wyd there*

COLEMAN: *Getting that gun transfer in my name so he can ship*

JM: *Why they sold it*

COLEMAN: *Wtf*

COLEMAN: *You getting something else*

JM: *I'm looking*

COLEMAN: *Okay about to take a nap I love you text me when your on the way back*

JM: *Love you too*

[emoji added to JM's text indicating COLEMAN loved a response]

[COLEMAN sent a photo of a squirrel]

[emoji added to COLEMAN's text with photo indicating JM loved the image]

JM: *What he say about the gun?*

COLEMAN: *I'm learning lol so when you buy guns on line you have to find FFL which was the elite guns place I picked I get it registered in my name he sent the gun place my information and now I just wait intill the*

gun comes they don't ship guns to your house I'll have to pick it up at the place I got it registered on now we just waiting on him to ship it!

24. On or about August 31, 2020, COLEMAN and JM had the following text conversation:

JM: My suitcases over there
COLEMAN: No you didn't bring them
JM: Oh yea I'm tripping Lol they here
COLEMAN: [iPhone emojis signifying hands to the face]
COLEMAN: I should have said yes
[JM laughed at COLEMAN's response]
JM: They shipped the gun it?
COLEMAN: Lol you would have been mad?
COLEMAN: And yes
JM: Real mad
[JM laughed at COLEMAN's response]
COLEMAN: [iPhone emojis signifying laughter]
JM: And how you knw they shipped it?
COLEMAN: Got shipping number baby
COLEMAN: IZ33E1264291653574
JM: When it say it be here
[COLEMAN sent JM a screenshot of the tracking information indicating the gun will be delivered by Thursday, September 3, 2020]
JM: [iPhone emojis signifying raising hands]
COLEMAN: I'm sick of you and this gun glad you finally got one, you could have been had one you was being picky
[COLEMAN sent JM a screen shot of another Century Arms Micro Draco pistol priced at \$1,125.00]
COLEMAN: We won this one to right when I paid for the other one [iPhone emoji signifying a neutral face]
JM: [iPhone emoji signifying hands to the face and an unamused face]
COLEMAN: Just 200 cheaper idk why they haven't put it back so people sh [should] bid on it

25. On or about September 3, 2020, COLEMAN and JM had the following text

conversation:

[COLEMAN sent JM a picture of a box with her name on it at a gun shop, the shipping information said “Kashanna Coleman, Elite Guns, ste 107, 2121 W Parmer LN, Austin, Texas 78727”]

JM: You there?

COLEMAN: Yes

JM: The clip in there?

COLEMAN: What's that baby

[COLEMAN sent JM the following photo of the Draco in the box with a packaged magazine for the Draco]



JM: I can meet you at the apt if you bout to leave

COLEMAN: If you don't wanna ride with it I can wait on you baby

JM: Naw you good kuz I dnt knw how long ima be

COLEMAN: Okay I'll meet you at the apartments I'm on the way

COLEMAN: I'll send you a pic in a sec baby

JM: You put that money up

COLEMAN: Yes baby I put it in the arm rest

[COLEMAN sent JM an image of an individual holding a larger style Draco with an attached magazine drum on it]

COLEMAN: Is this the same as yours?

JM: Yes but the big one

JM: That can go on mines too

COLEMAN: Ah okay, that would be nice I seen them at the store

26. On or about September 3, 2020, COLEMAN completed, signed, and certified as true an ATF Form 4473, Firearms Transaction Record, in connection with the acquisition and purchase of a Micro Draco model pistol, serial number PMD-20795-20 from Elite Guns, Inc., a federal firearms licensee located in Austin, Texas, in the Western District of Texas. COLEMAN answered “Yes” in response to Question 21.a. of the ATF Form 4473, which asked “*Are you the actual transferee/buyer of the firearm(s) listed on this form and any continuation sheet(s) (ATF Form 5300.9A)* *Warning: You are not the actual transferee/buyer if you are acquiring the firearm(s) on behalf of another person. If you are not the actual transferee/buyer, the licensee cannot transfer the firearm(s) to you. Exception: If you are only picking up a repaired firearm(s) for another person, you are not required to answer 21.a. and may proceed to 21.b.*” Based on the aforementioned facts, there is reason to believe that COLEMAN knowingly made a false statement in response to Question 21.a. when, in truth and fact, as COLEMAN then knew, COLEMAN was not the actual buyer of the firearm and acquired the firearm on behalf of another person. On the ATF Form 4473, COLEMAN stated she then resided at the address for her mother’s residence in Pflugerville, Texas.

27. On or about September 6, 2020, COLEMAN and JM had the following text conversation:

COLEMAN: Wyd

[JM sent COLEMAN a picture of a Draco that resembles the same Draco COLEMAN picked up on September 3, 2020 from Elite Guns]

COLEMAN: You and that gun lol

COLEMAN: About to go to sleep baby goodnight I love you

JM: Love you too

28. On or about September 9, 2020, COLEMAN and JM had the following text conversation:

COLEMAN: lol why you didn't send me no pic

[JM sent COLEMAN a selfie style photo of himself holding a Draco that resembles the same Draco that COLEMAN purchased and picked up on September 3, 2020]

COLEMAN: [emoji added to image indicating JM loved the image]

COLEMAN: I'm sick of you and that gun baby

JM: Lol

COLEMAN: I was about to ask what you was doing but I see now

29. On or about November 14, 2020, COLEMAN and JM had the following text conversation:

JM: I think I need to get that gun out my house

COLEMAN: Why baby

30. On or about February 21, 2021, COLEMAN and JM had the following text conversation:

[JM sent COLEMAN a screen shot of an FN Five Seven leather shoulder gun holster listed at \$129.95 on Amazon.com]

COLEMAN: You want me to order this?

JM: You have Amazon

COLEMAN: Yes sir

JM: I need that baby

JM: See if one cheaper

COLEMAN: Okay daddy let me look

JM: I'll give you the money tmr [tomorrow]

COLEMAN: Okay baby

31. On or about February 22, 2021, COLEMAN and JM had the following text conversation:

COLEMAN: Got the tracking number [iPhone emoji signifying a party face]

[COLEMAN sent JM a cropped photo of a tracking number dated February 20, 2021, from an employee of North Gaston Gun Shop, with a partially displayed address of "PO Box 1038, Dallas, NC 2803"]

JM: What you been doing

COLEMAN: Nothing workin on phone with your mama now

JM: You look up the holster?

COLEMAN: Yes let me show you

[COLEMAN sent JM a screen shot of a Big Horn gun shoulder holster listed at \$21.95 on Amazon.com]

[emoji added to COLEMAN's text indicating JM liked the screenshot]

JM: You sure it fit

JM: How long with it take?

JM: Will

COLEMAN: It say Saturday if I order it now

COLEMAN: And I'm sure it will fit

[COLEMAN sent JM a screen shot of the Amazon.com order indicating the shoulder holster will be delivered to Kashanna Coleman on Saturday, Feb. 27]

[emoji added to COLEMAN's text indicating JM liked the screenshot]

JM: I'ma be to kool

JM: Lol

COLEMAN: To cool baby you just one wear it over your clothes silly

JM: It's cold so I can wear it underneath my jacket and shit lol

COLEMAN: Oh okay ya you gone be cool cool

32. On or about February 23, 2021, COLEMAN and JM had the following text conversation:

JM: Wyd baby

COLEMAN: Working about to go to get dressed to go get that gun

COLEMAN: Wyd

JM: It's here?

COLEMAN: Yes that's what it say I'm take my lunch at I to go get it

JM: Where it's at?

[COLEMAN sent an image that didn't go through]

COLEMAN: Wyd

JM: Just got up

JM: What you send me?

COLEMAN: You ask me where is the place at

[JM sent COLEMAN a screen shot of his phone, showing he didn't receive an image]

JM: My shit tripping

[COLEMAN sent JM a screen shot of Elite Guns located at 2121 W Parmer Ln, Suite 107, Austin, Texas, the same shop COLEMAN picked up the Micro Draco on September 03, 2020]

COLEMAN: Slick ass you had to crop the picture out

JM: See what accessories they have to go with it

[JM questioned COLEMAN's response]

COLEMAN: Look how you sent me them screenshots

JM: Oh lol you in my Business

COLEMAN: Smh [shaking my head] no and okay I will

JM: Wyd

COLEMAN: Nun [nothing] workin

JM: I'm bout to get up

COLEMAN: Okay text me when you get up

JM: Where mj

COLEMAN: With my mama I was gone get him lastnight but he was sleep when I finished getting my nails done

JM: Wyd

COLEMAN: Waiting on him he was running my background check

COLEMAN: What type of accessories are you looking for baby?

JM: What he got?

JM: Extended clip or something?

COLEMAN: Let me ask

JM: What type of accessories do he have for it tho?

COLEMAN: A light! And a holster

JM: Send pic baby

[COLEMAN sent JM a screen shot of a Surefire X300U light for a firearm from Amazon for \$309.95]

COLEMAN: This the light

COLEMAN: When he finish this paper work he's going to show me the holster

JM: Damn it's 300? Hell naw

COLEMAN: Lol. [laughing out loud] WTF [what the fuck] do it do

JM: That bitch better light a nigga as up and make him freeze

COLEMAN: Lmao. [laughing my ass off] Nah frfr [for real, for real] cause TF

COLEMAN: Do you need bullets?

COLEMAN: I got you a holster

JM: Yea

COLEMAN: How many

JM: How many kum in a small box?

COLEMAN: 2 a bullet

JM: Man 2 bullets on a box?

*JM: In**

COLEMAN: \$100 50 rounds

JM: Ok I'ma give your money back

JM: Will he let you shoot it?

COLEMAN: What you mean

JM: Is there a shooting thing there?

COLEMAN: No not in here?

JM: Oh

COLEMAN: You wanna shoot it

COLEMAN: You can go to the range

JM: Yea I'ma just shoot at my granny's lol

COLEMAN: Lmao man

*JM: It**

COLEMAN then sent JM two images of an FN firearm bearing the serial number 386193495, situated inside a firearm case conforming to the firearm:



The first image depicts what appears to be the Clark FN Firearm that was later obtained during the search of CLARK's residence at 1908 Shaker Trail on September 08, 2021. The second image depicts what appear to be the Clark FN Firearm in its case, a firearm transfer form containing the same serial number as the Clark FN Firearm, a box of bullets, and the holster that COLEMAN told JM she purchased for him in the previous message thread.

33. On or about February 23, 2021, COLEMAN completed, signed, and certified as true an ATF Form 4473, Firearms Transaction Record, in connection with the acquisition and purchase of an FN Five-Seven model pistol, serial number 386193495 from Elite Guns, Inc., a federal firearms licensee located in Austin, Texas, in the Western District of Texas. COLEMAN answered "Yes" in response to Question 21.a. of the ATF Form 4473, which asked "*Are you the actual transferee/buyer of the firearm(s) listed on this form and any continuation sheet(s) (ATF Form 5300.9A)* *Warning: You are not the actual transferee/buyer if you are acquiring the firearm(s) on behalf of another person. If you are not the actual transferee/buyer, the licensee*

cannot transfer the firearm(s) to you. Exception: If you are only picking up a repaired firearm(s) for another person, you are not required to answer 21.a. and may proceed to 21.b." Based on the aforementioned facts, there is reason to believe that COLEMAN knowingly made a false statement in response to Question 21.a. when, in truth and fact, as COLEMAN then knew, COLEMAN was not the actual buyer of the firearm and acquired the firearm on behalf of another person. On the ATF Form 4473, COLEMAN stated she then resided at the address for her mother's residence in Pflugerville, Texas.

34. On or about February 24, 2021, COLEMAN and JM had the following text conversation:

JM: Thank you baby
COLEMAN: Yw [you're welcome] baby I love you
COLEMAN: Did the gun fit
JM: Yea this shit 3 kool
COLEMAN: Let me see baby

35. On or about March 07, 2021, COLEMAN and JM had the following text conversation:

[JM sent COLEMAN the following photo of a Micro Draco firearm that resembled the same Micro Draco firearm that COLEMAN purchased for JM on or about August 28, 2020]



COLEMAN: I was just about to ask what you doing your must be watching tv

JM: Me and baby been sitting here all day lol

36. On or about September 22, 2021, COLEMAN was voluntarily interviewed by me and other FBI personnel. COLEMAN was informed that the interviewers were FBI Agents and Task Force Officers, who identified themselves to her as such.

a. COLEMAN stated she was employed as a License Analyst with the Texas Department of Public Safety. During the interview, COLEMAN was asked about the Clark FN Firearm that was located at 1908 Shaker Trail, Austin, Texas. COLEMAN stated that she left the firearm at 1908 Shaker Trail, the residence of Joniqua Mendez (who is also known as Joniqua Clark), during Joniqua Mendez's birthday party. COLEMAN stated she left her firearm in a locked case but did not remember where she left the firearm. COLEMAN purchased the FN 5.7 firearm around February 2021 and has had the firearm in her possession locked in her house since the date she picked it up. COLEMAN has never let anyone borrow the firearm for any reason. COLEMAN

stated she had never purchased a firearm for anyone.

b. At the end of the interview, COLEMAN was asked if she had any self-employment and she responded “no” and that she works for the Department of Public Safety as a full-time License Analyst.

c. It should be noted that during the search of CLARK’s residence on September 8, 2021, agents did not locate a firearms case in the vicinity of the Clark FN Firearm or anywhere else in the residence.

37. On or about October 11, 2021, COLEMAN was voluntarily interviewed by FBI personnel. The interview was coordinated with COLEMAN’s attorney, Amber Vasquez, who was also present during the interview. COLEMAN and Ms. Vasquez were informed that the interviewers were FBI Agents, who identified themselves to her as such. The following is a summary of the material portions of the interview:

a. COLEMAN was asked a series of similar questions that were asked during her first interview on September 22, 2021. COLEMAN stated she attended a birthday party at Joniqua’s house on September 07, 2021. COLEMAN carried her FN pistol, which she said was still inside the case, inside of her purse to the party at Joniqua’s. COLEMAN left her FN pistol (along with the firearm case) at Joniqua’s house after the party because COLEMAN was drunk. COLEMAN could not remember where she left her gun in Joniqua’s house before she departed. COLEMAN stated she departed the residence after the party in the early morning hours on September 08, 2021 but could not remember the exact time. COLEMAN drove her own vehicle when she left the party. [Affiant’s note: Information from Texas DPS, COLEMAN’s employer, indicated that COLEMAN had called in sick on September 7 and September 8, 2021, and was not present at work.]

b. COLEMAN was asked how Tyree CLARK had possession of her firearm in February. COLEMAN stated she did not know how CLARK had possession of her firearm.

c. COLEMAN was informed about a Snapchat video CLARK shared on his Snapchat account in February in which he was depicted holding the exact same model FN firearm with similar markings to the FN firearm that COLEMAN purchased (i.e., the Clark FN Firearm) along with the receipt showing COLEMAN purchased the firearm. COLEMAN was asked again how CLARK had possession of her FN firearm with her receipt from the selfie style video that CLARK took. COLEMAN then stated she loaned the firearm to Joniqua and CLARK to use at the firing range for a week or two. COLEMAN stated she doesn't remember the exact date of when she loaned it to them, but that it was in February. COLEMAN did not address why CLARK had the receipt in his possession.

d. COLEMAN was asked by investigators if anyone had ever asked her to purchase a firearm for them. COLEMAN responded "no." COLEMAN was provided with a picture that was obtained from previous phone analysis of a Draco firearm that she had purchased in September 2020. COLEMAN was then asked again if anyone had ever asked her to purchase a firearm for them and she stated she did not want to answer that question. COLEMAN stated that the Draco style firearm that she purchased is at her apartment.

38. On or about December 6, 2021, I contacted COLEMAN's attorney, Amber Vasquez. Amber Vasquez stated that COLEMAN had the Draco firearm in her (COLEMAN's) possession and was willing to deliver the Draco firearm to the FBI. With her attorney's permission, I then contacted COLEMAN by phone to arrange a time for her to meet with me at the FBI office located at 12515 Research Boulevard, Austin, Texas, to deliver the Draco firearm. COLEMAN did not show up at the agreed-upon time and place. As of the date of this Affidavit, COLEMAN

has never delivered the Draco firearm to the FBI, nor has COLEMAN or her attorney ever contacted the FBI again about the Draco firearm or delivering the Draco firearm to the FBI.

Conclusion

39. Based on the foregoing, there is probable cause to believe that the Defendant Kashanna COLEMAN committed the offense(s) set forth in the attached Criminal Complaint.

FURTHER AFFIANT SAYETH NAUGHT.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.



BRANDY HORTON
Special Agent
Federal Bureau of Investigation
Austin, Texas

Sworn to me by telephone under Rule 4.1 of the Federal Rules of Criminal Procedure on this 20th day of December, 2021.



UNITED STATES MAGISTRATE JUDGE